

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SOFIYA GJANBOLAJ,

Plaintiff(s),

-against-

**DEFENDANTS RULE 26A(1)  
DISCLOSURE**

BRAUN DIVISION OF GILETTE,  
THE GILETTE COMPANY and  
PROCTER & GAMBLE COMPANY,

**Civil No.: 08-cv-3003 (DLC)**

Defendant(s).

**PLEASE TAKE NOTICE**, that Defendants, **THE GILETTE COMPANY and PROCTER & GAMBLE COMPANY**, by their attorneys Goldberg Segalla, LLP, as and for their Initial Rule 26A(1) disclosure allege:

**DISCLOSURES**

**A. Individuals Likely to Have Discoverable Information (Rule 26(a)(1)):**

Responding defendants do not have sufficient information at this time to identify each and every individual likely to have discoverable information.

**B. Documents, Data Compilations, and Tangible Things (Rule 26(a)(1)(B)):**

Responding defendants do not have sufficient information at this time to identify specific categories of documents that they may use to support their defenses in this matter. Defendants state, however, they will be relying on documents, testimony and information supplied by Plaintiff and certain representatives and employees with respect to all claims alleged in Plaintiff's Complaint.

Additional information and or documentation which may be relevant to the subject litigation will be provided in accordance with the Federal Rules of Civil Procedure governing discovery and by Rule 26 of the Federal Rules of Civil Procedure.

C. **Computation of Damages (Rule 26(a)(1)(C)):**

Not Applicable

D. **Insurance Agreement (Rule 26(a)(1)(D)):**

The defendant THE GILLETTE COMPANY is a wholly owned subsidiary of THE PROCTER & GAMBLE COMPANY. THE PROCTER & GAMBLE COMPANY is self insured for the amounts in controversy in this litigation.

Dated: White Plains, New York  
April 11, 2008

Yours, etc.,

By: /s/ Brian T. Stapleton  
Brian T. Stapleton, Esq (BS5460)  
GOLDBERG SEGALLA, LLP  
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G.S. File No.: 12895.0026  
Juris No.: 402290

**CERTIFICATION**

I hereby certify that on April 11, 2008, a copy of the Rule 26A(1) was filed electronically and served by mail upon anyone unable to accept electronic filing. Notice of this filing was will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

GOLDBERG SEGALLA, LLP

By: /s/ Brian T. Stapleton  
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